

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE STATEMENT COVER SHEET**

Debtor: LTL Management LLC Applicant: Paul Hastings LLP  
Case No.: 23-12825 (MBK) Client: Ad Hoc Committee of Supporting Counsel  
Chapter: 11 Case Filed: April 4, 2023

**SECTION I  
FEE SUMMARY**

Monthly Fee Statement Covering the Period from  
January 1, 2024 through January 31, 2024

Total Fees:	\$194,411.00
Total Disbursements:	\$5,577.97
Minus 20% holdback of Fees:	(38,882.20)
<b>Amount Sought at this Time</b>	<b>\$161,106.77</b>

				Total for Statement Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Hansen, Kris	Financial Restructuring	1996	\$2,300.00	4.60	\$10,580.00
Murphy, Matt	Financial Restructuring	1999	\$1,985.00	1.70	\$3,374.50
Whitner, William	Complex Litigation & Arbitration	1996	\$1,890.00	8.50	\$16,065.00
<b>Total Partner:</b>				14.80	\$30,019.50
Micheli, Matthew	Financial Restructuring	2002	\$1,885.00	1.50	\$2,827.50
Montefusco, Ryan	Financial Restructuring	2012	\$1,850.00	81.70	\$151,145.00
Traxler, Katherine	Financial Restructuring	1990	\$1,120.00	0.40	\$448.00

				Total for Statement Period	
Name	Department or Group	Date of First Admission	Hourly Rate	Hours Billed	Amount
Total Counsel:				83.60	\$154,420.50
Glogowski, Angelika			\$1,185.00	2.40	\$2,844.00
Miliotes, Lanie	Financial Restructuring	2023	\$985.00	5.40	\$5,319.00
Total Associate:				7.80	\$8,163.00
Laskowski, Mat	Financial Restructuring		\$565.00	0.30	\$169.50
Magzamen, Michael	Financial Restructuring		\$565.00	2.30	\$1,299.50
Mohamed, David	Financial Restructuring		\$565.00	0.60	\$339.00
Total Paraprofessional:				3.20	\$1,808.00
Total:				109.40	\$194,411.00

**SECTION II  
SUMMARY OF SERVICES**

		<b>Total for Statement Period</b>	
<b>U.S. Trustee Task Code and Project Category</b>		<b>Total Hours</b>	<b>Total Fees</b>
B110	Case Administration	0.30	\$169.50
B160	Employment / Fee Applications (Paul Hastings)	3.80	\$5,177.00
B165	Fee/Employment Applications for Other Professionals	0.50	\$942.50
B191	General Litigation	104.80	\$188,122.00
<b>TOTAL</b>		<b>109.40</b>	<b>\$194,411.00</b>

**SECTION III**  
**SUMMARY OF DISBURSEMENTS**

Category	Total for Statement Period
Computer Search	\$2,378.74
Court Reporting Services	\$2,316.53
Lodging	\$802.36
Taxi/Ground Transportation	\$80.34
<b>TOTAL</b>	<b>\$5,577.97</b>

I certify under the penalty of perjury that the above is true.

Dated: April 12, 2024

/s/ Mathew M. Murphy  
Mathew M. Murphy

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

PAUL HASTINGS LLP  
200 Park Avenue  
New York, New York 10166  
Kristopher M. Hansen (*admitted pro hac vice*)

PAUL HASTINGS LLP  
71 South Wacker Drive, Suite 4500  
Chicago, Illinois 60606  
Matthew M. Murphy (*admitted pro hac vice*)  
Matthew Micheli (*admitted pro hac vice*)

COLE SCHOTZ P.C.  
Court Plaza North  
25 Main Street, P.O. Box 800  
Hackensack, New Jersey 07602-0800  
Michael D. Sirota  
Warren A. Usatine  
Seth Van Aalten (*admitted pro hac vice*)  
Justin Alberto (*admitted pro hac vice*)

PARKINS & RUBIO LLP  
700 Milam, Suite 1300  
Houston, Texas 77002  
Lenard M. Parkins (*admitted pro hac vice*)  
Charles M. Rubio (*admitted pro hac vice*)

*Counsel to Ad Hoc Committee of Supporting  
Counsel*

In re:

LTL MANAGEMENT LLC,<sup>1</sup>

Debtor.

Chapter 11

Case No.: 23-12825 (MBK)

Judge: Michael B. Kaplan

**MONTHLY FEE STATEMENT OF PAUL HASTINGS LLP,  
COUNSEL TO AD HOC COMMITTEE OF SUPPORTING COUNSEL, FOR THE  
PERIOD FROM JANUARY 1, 2024 THROUGH JANUARY 31, 2024**

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<sup>1</sup> The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

On June 20, 2023, the Court entered the Order Authorizing the Debtor to Enter into the Reimbursement Agreement [ECF No. 838] (the “Reimbursement Order”), pursuant to which the Debtor entered into a post-petition expense reimbursement agreement (the “Reimbursement Agreement”) to pay certain fees and expenses of the Ad Hoc Committee of Supporting Counsel (the “AHC of Supporting Counsel”).

The Reimbursement Agreement provides that the Debtor will pay the reasonable and documented fees and out-of-pocket expenses of professionals retained by the AHC of Supporting Counsel, including, among others, Paul Hastings LLP (“Paul Hastings”), for the period from April 18, 2023 through the termination of the Reimbursement Agreement.

The Reimbursement Agreement further provides that Paul Hastings will file monthly fee statements and interim and final fee applications in accordance with the Court’s Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Retained Professionals [ECF No. 562] (the “Interim Compensation Order”), entered on May 22, 2023.

The Court’s *Order (I) Dismissing Debtor’s Chapter 11 Petition Pursuant to 11 U.S.C. § 1112(b); (II) Establishing Procedures With Respect to Requests for Compensation; and (III) Granting Related Relief* [ECF No. 1211] (the “Dismissal Order”) provides that the “fees and expenses of professionals retained by the Ad Hoc Committee of Supporting Counsel shall remain subject to the” Reimbursement Agreement. The Dismissal Order further provides that the Interim Compensation Order “shall remain in full force and effect through and including the Appeal Exhaustion Date” for Retained Professionals, which covers professionals retained by the Ad Hoc Committee of Supporting Counsel.

Paul Hastings respectfully submits this Fee Application in accordance with the Reimbursement Order, the Reimbursement Agreement, the Interim Compensation Order and the

Dismissal Order for services rendered and expenses incurred as counsel to the Ad Hoc Committee of Supporting Counsel for the period commencing January 1, 2024 and ending January 31, 2024 (the “Statement Period”).

The billing invoices, along with a detailed breakdown of all out-of-pocket disbursements necessarily incurred by Paul Hastings for the Statement Period are annexed hereto as Exhibit A. These invoices detail the services performed by Paul Hastings.

The payment of fees and reimbursement of expenses requested in this Statement are as follows:

<b>Fees (100%)</b>	<b>Fee Holdback (20%)</b>	<b>Fee Payment (80%)</b>	<b>Expense Reimbursement (100%)</b>
\$194,411.00	\$38,882.20	\$155,528.80	\$5,577.97

**WHEREFORE**, Paul Hastings respectfully requests payment of fees and reimbursement of expenses for the Statement Period of \$161,106.77 (80% of total fees and 100% of expenses) in accordance with the Interim Compensation Order.

Dated: April 12, 2024

**PAUL HASTINGS LLP**

/s/ Matthew M. Murphy  
Matthew M. Murphy (*admitted pro hac vice*)  
Matthew Micheli (*admitted pro hac vice*)  
71 South Wacker Drive, Suite 4500  
Chicago, IL 60606  
Telephone: (312) 499-6000  
Email: mattmurphy@paulhastings.com  
mattmicheli@paulhastings.com

Kristopher M. Hansen (*admitted pro hac vice*)  
200 Park Avenue  
New York, NY 10166  
Telephone: (212) 318-6000  
Email: krishansen@paulhastings.com

*Counsel to AHC of Supporting Counsel*



**EXHIBIT A**



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Ad Hoc Committee of Supporting Talc Counsel in LTL March 25, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2391831

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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### SUMMARY SHEET

**Representation in Chapter 11 bankruptcy proceedings**

PH LLP Client/Matter # 51691-00002  
Scott A. Heard

Legal fees for professional services for the period ending January 31, 2024	\$194,411.00
Costs incurred and advanced	5,577.97
<b>Current Fees and Costs Due</b>	<b>\$199,988.97</b>
<b>Total Balance Due - Due Upon Receipt</b>	<b>\$199,988.97</b>



**PAUL HASTINGS LLP**  
200 Park Avenue, New York, NY 10166-3205  
t: +1.212.318.6000 | f: +1.212.319.4090 | www.paulhastings.com

Ad Hoc Committee of Supporting Talc Counsel in LTL March 25, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2391831

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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**REMITTANCE COPY**

**Representation in Chapter 11 bankruptcy proceedings**

PH LLP Client/Matter # 51691-00002  
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Ad Hoc Committee of Supporting Talc Counsel in LTL March 25, 2024  
488 Madison Avenue  
New York, NY

Please Refer to  
Invoice Number: 2391831

Attn: Jonathan Schulman

PH LLP Tax ID No. 95-2209675

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FOR PROFESSIONAL SERVICES RENDERED  
for the period ending January 31, 2024

**Representation in Chapter 11 bankruptcy proceedings** **\$194,411.00**

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
<b>B110 Case Administration</b>					
01/08/2024	ML30	Correspond with R. Montefusco re case expenses (.1); review and comment on payment of same (.1)	0.20	565.00	113.00
01/09/2024	ML30	Correspond with R. Montefusco re case expenses; review and comment on payment of same	0.10	565.00	56.50
<b>Subtotal: B110 Case Administration</b>			<b>0.30</b>		<b>169.50</b>
<b>B160 Fee/Employment Applications</b>					
01/02/2024	AG29	Correspond with M. Micheli regarding change in rates (.1); review documents and issues related to same (.2)	0.30	1,185.00	355.50

Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2391831

Page 2

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/03/2024	AG29	Review documents and issues related to notice of change in rates (.6); correspond with M. Micheli, K. Traxler regarding same (.3); draft notice of change in rates (.4); correspond with B. Churbuck (Cole Schotz) regarding local precedent regarding same (.1)	1.40	1,185.00	1,659.00
01/03/2024	KAT2	Review and respond to inquiries from A. Glogowski regarding notice of change in rates (.1); review fee reimbursement order and consider same (.2)	0.30	1,120.00	336.00
01/04/2024	AG29	Correspond with M. Micheli, M. Murphy, K. Traxler regarding PH notice of rate increase (.3); review documents and issues related to same (.4)	0.70	1,185.00	829.50
01/04/2024	MM53	Analyze fee application issues related to rate increases	0.50	1,885.00	942.50
01/05/2024	KAT2	Review correspondence from A. Glogowski regarding rate adjustment	0.10	1,120.00	112.00
01/23/2024	MM53	Telephone conference with S. Van Aalten regarding invoices for filing (.2); review final invoices (.3)	0.50	1,885.00	942.50
<b>Subtotal: B160 Fee/Employment Applications</b>			<b>3.80</b>		<b>5,177.00</b>
 <b>B165 Fee/Employment Applications for Other Professionals</b>					
01/05/2024	MM53	Analyze fee applications	0.50	1,885.00	942.50
<b>Subtotal: B165 Fee/Employment Applications for Other Professionals</b>			<b>0.50</b>		<b>942.50</b>
 <b>B191 General Litigation</b>					
01/12/2024	RM30	Analyze caselaw re LTL appellate issues	3.30	1,850.00	6,105.00
01/16/2024	RM30	Analyze caselaw and documents re LTL appellate issues (6.8); update findings re same (1.4)	8.20	1,850.00	15,170.00

Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2391831

Page 3

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<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/17/2024	RM30	Analyze caselaw and documents re LTL appellate issues (7.3); update analysis re same (1.6)	8.90	1,850.00	16,465.00
01/18/2024	RM30	Analyze and refresh research re LTL appellate issues	9.30	1,850.00	17,205.00
01/19/2024	RM30	Analyze and update research re LTL appellate issues	8.30	1,850.00	15,355.00
01/22/2024	RM30	Analyze and update research re LTL appellate issues	8.80	1,850.00	16,280.00
01/23/2024	KH18	Discuss recent filings and case update with client (.6); review appellate issues (.4)	1.00	2,300.00	2,300.00
01/23/2024	MMM5	Review amicus briefs regarding curbing Texas two step	0.50	1,985.00	992.50
01/25/2024	KH18	Analyze appeal issues (2.0); correspond with R. Montefusco regarding same (.5)	2.50	2,300.00	5,750.00
01/25/2024	LM20	Correspond with W. Farmer re appellee opening briefs and case updates	0.20	985.00	197.00
01/26/2024	DM26	Review recent filings regarding LTL AHSC dismissal appeal case pending in the Third Circuit (.4), update working group re same (.2)	0.60	565.00	339.00
01/26/2024	KH18	Conference with R. Montefusco re appellate opposition briefs	1.10	2,300.00	2,530.00
01/26/2024	LM20	Correspond with D. Mohamed re appellee briefs (.2); analyze same (.6)	0.80	985.00	788.00
01/26/2024	RM30	Analyze appellate opposition briefs (3.8); conference with K. Hansen re same (1.1)	4.90	1,850.00	9,065.00
01/27/2024	WKW	Analyze appellate opposition briefs of U.S. Trustee	2.70	1,890.00	5,103.00
01/27/2024	WKW	Analyze appellate opposition briefs of TCC	2.50	1,890.00	4,725.00
01/27/2024	WKW	Analyze appellate opposition briefs of State of New Mexico	1.20	1,890.00	2,268.00
01/27/2024	WKW	Analyze appellate opposition briefs of Arnold & Itkin	2.10	1,890.00	3,969.00

Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2391831

Page 4

<u>Date</u>	<u>Initials</u>	<u>Description</u>	<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
01/29/2024	LM20	Correspond with M. Magzamen re appellate briefing and draft reply brief (.5); correspond with W. Farmer re same (.2); correspond with R. Montefusco re same (.1); revise appellate reply brief (.5)	1.30	985.00	1,280.50
01/29/2024	MMM5	Review appellate opposition briefs	1.20	1,985.00	2,382.00
01/29/2024	MM57	Correspond with L. Miliotes re: motion to dismiss appeal (.2); review and prepare for working group the appellate briefs and appendices for motion to dismiss appeal (1.4); draft shell reply brief (.5); correspond with W. Farmer re: same (.2)	2.30	565.00	1,299.50
01/29/2024	RM30	Analyze LTL opposition briefs and authority cited therein (7.6); conference with Jones Day re oral argument (.1)	7.70	1,850.00	14,245.00
01/30/2024	LM20	Analyze motion to dismiss briefing re sovereign immunity issues (.4); correspond with R. Montefusco re same (.3)	0.70	985.00	689.50
01/30/2024	RM30	Analyze LTL opposition briefs and authority cited therein (4.5); analyze caselaw and statutory authority re sovereign immunity (2.2); analyze caselaw re non-debtor injunction (3.4); draft outline for reply (.4)	10.50	1,850.00	19,425.00
01/31/2024	LM20	Analyze Purdue briefing re creditor support (1.3); correspond with R. Montefusco re same (.2); review joint appendix re creditor support (.8); correspond with R. Montefusco re same (.1)	2.40	985.00	2,364.00
01/31/2024	RM30	Analyze LTL opposition authority (2.3); analyze caselaw re sovereign immunity (1.9); analyze caselaw re non-debtor injunction (1.2); analyze caselaw re application of section 1112(b)(2) (3.7); draft outline for reply brief (2.7)	11.80	1,850.00	21,830.00
<b>Subtotal: B191 General Litigation</b>			<b>104.80</b>		<b>188,122.00</b>
<b>Total</b>			<b>109.40</b>		<b>194,411.00</b>

Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2391831

Page 5

### Timekeeper Summary

<u>ID</u>	<u>Timekeeper Name</u>	<u>Title</u>	<u>Hours</u>	<u>Rate</u>	<u>Fee</u>
KH18	Kris Hansen	Partner	4.60	2,300.00	10,580.00
MMM5	Matt M. Murphy	Partner	1.70	1,985.00	3,374.50
WKW	William K. Whitner	Partner	8.50	1,890.00	16,065.00
MM53	Matthew Micheli	Of Counsel	1.50	1,885.00	2,827.50
RM30	Ryan Montefusco	Of Counsel	81.70	1,850.00	151,145.00
KAT2	Katherine A. Traxler	Of Counsel	0.40	1,120.00	448.00
AG29	Angelika S. Glogowski	Associate	2.40	1,185.00	2,844.00
LM20	Lanie Miliotes	Associate	5.40	985.00	5,319.00
ML30	Mat Laskowski	Paralegal	0.30	565.00	169.50
DM26	David Mohamed	Paralegal	0.60	565.00	339.00
MM57	Michael Magzamen	Paralegal	2.30	565.00	1,299.50

### Costs incurred and advanced

<u>Date</u>	<u>Description</u>	<u>Quantity</u>	<u>Rate</u>	<u>Amount</u>
01/02/2024	Court Reporting Services - Counsel Press, Invoice# 0009156638 Dated 01/02/24, Preparation of Brief regarding to LTL Management LLC.			2,316.53
01/17/2024	Lodging - Matthew Murphy; 06/30/2023; Hotel: Westin; City: Princeton, NJ; Check-in date: 06/26/2023; Check-out date: 06/30/2023; Trip to Princeton, NJ (June 26-30, 2023) for meetings with client to strategize regarding upcoming trial issues.			802.36
01/17/2024	Taxi/Ground Transportation - Matthew Murphy; 06/28/2023; From/To: court/hotel; Service Type: Uber; Time: 12:30; Trip to Princeton, NJ (June 26-30, 2023) for meetings with client to strategize regarding upcoming trial issues.			80.34
01/18/2024	Lexis/On Line Search			85.50
01/19/2024	Westlaw			185.74
01/22/2024	Westlaw			945.08
01/23/2024	Computer Search (Other)			0.36



Ad Hoc Committee of Supporting Talc Counsel in LTL  
51691-00002  
Invoice No. 2391831

Page 6

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01/24/2024 Westlaw	165.00
01/26/2024 Computer Search (Other)	27.27
01/30/2024 Westlaw	884.29
01/31/2024 Lexis/On Line Search	85.50
<b>Total Costs incurred and advanced</b>	<b>\$5,577.97</b>

<b>Current Fees and Costs</b>	<b>\$199,988.97</b>
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<b>Total Balance Due - Due Upon Receipt</b>	<b>\$199,988.97</b>
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